

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

C.A. NO. 05-CV-11832-GAO

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RONNIE JONES, RICHARD BECKERS, )  
WALTER R. WASHINGTON, WILLIAM )  
E. BRIDGEFORTH, SHAWN N. HARRIS, )  
EUGENE WADE, GEORGE )  
C. DOWNING, JR., CLARARISE )  
BRISTOW, and the MASSACHUSETTS )  
ASSOCIATION OF MINORITY LAW )  
ENFORCEMENT OFFICERS, )  
 )  
Plaintiffs )  
vs. )  
 )  
CITY OF BOSTON, BOSTON POLICE )  
DEPARTMENT, and KATHLEEN )  
O'TOOLE, as she is Police Commissioner )  
for the Boston Police Department, )  
 )  
Defendants )  

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DEFENDANTS' MOTION FOR A PROTECTIVE ORDER

Defendants request that the Court enter a protective order, that the depositions of Attorney Alicia McDonnell and Police Officer Michael J. O'Sullivan, not be had since the depositions are duplicative, unnecessary, and would impose an undue burden on Defendants were they to proceed. Further support for this Motion is provided in the accompanying Memorandum of Law.

Respectfully submitted,  
Defendants City of Boston,  
Boston Police Department, and  
Kathleen O'Toole  
By their attorney,

\_\_\_\_/s/ Mary Jo Harris\_\_\_\_\_  
Mary Jo Harris, BBO # 561484  
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Boston, MA 02109-2605  
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Dated: August 17, 2007